

February 3, 2006

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: EB Docket No. 06-36 and EB-06-TC-060, Certification of CPNI Filing, February 3, 2006, for Roosevelt County Rural Telephone Cooperative, Inc.

Dear Ms. Dortch:

Enclosed is the CPNI compliance certificate of Roosevelt County Rural Telephone Cooperative, Inc.(499 Filer ID No. 803292) in response to the Public Notice issued by the Federal Communication Commission's Enforcement Bureau on January 30, 2006. The Enforcement Bureau has requested the compliance certificate as required by 47 C.F.R. §64.2009(e).

Please contact me with any questions or concerns.

Sincerely,

A handwritten signature in black ink, reading "Cecile Archibeque". The signature is fluid and cursive, with the first name "Cecile" and last name "Archibeque" clearly distinguishable.

Cecile Archibeque
Assistant General Manager – Roosevelt County Rural Telephone Cooperative, Inc.

cc: Byron McCoy, byron.mccoy@fcc.gov
Best Copy and Printing, Inc. (BCPI), fcc@bcpiweb.com

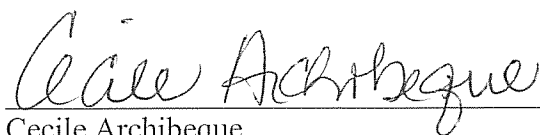
**Before the
Federal Communications Commission
Washington, D.C. 20554**

CPNI Compliance Certification	§	EB Docket No. 06-36 and EB-06-TC-060
As Required by FCC Enforcement	§	Roosevelt County Rural Telephone
Bureau, DA 06-223 and DA 06-258	§	Cooperative, Inc.
	§	499 Filer ID No. 803292

**ROOSEVELT COUNTY RURAL TELEPHONE COOPERATIVE, INC.
CERTIFICATION OF CPNI FILING (February 3, 2006)**

1. Roosevelt County Rural Telephone Cooperative, Inc. ("Roosevelt" or "Cooperative") (499 Filer ID No. 803292) is submitting this Compliance Certificate in response to the Public Notice issued by the FCC's Enforcement Bureau on January 30, 2006 (DA 06-223) and February 2, 2006 (DA 06-258), pursuant to 47 C.F.R. §64.2009(e).
2. As of the date of this certification, Roosevelt has not used CPNI for marketing purposes. Although Roosevelt has not used CPNI for marketing purposes, it has established the appropriate safeguards and protections to ensure compliance with the FCC's rules pursuant to the proper treatment of CPNI data. These safeguards include documentation of the Cooperative's CPNI Compliance Procedures in its Operating Practices and specific training of the Cooperative's personnel with regard to compliance with the maintenance, use, protection and safeguarding of CPNI data.
3. This certification is signed below by an officer of Roosevelt County Rural Telephone Cooperative, Inc. who has personal knowledge that Roosevelt has established procedures that are adequate to ensure compliance with the CPNI rules currently in effect and the statements contained in this filing are true and correct.

s/Via ECFS on 2/3/06; Original on file at Cooperative



Cecile Archibeque

Assistant General Manager, Roosevelt County Rural Telephone Cooperative, Inc.

**Statement of Customer Proprietary Network Information (CPNI)
Compliance Procedures for
Roosevelt County Rural Telephone Cooperative, Inc.**

Roosevelt County Rural Telephone Cooperative, Inc. ("RCRTC") complies with all CPNI regulations as contained in Section 222 of the Communications Act of 1934. This includes complying with the following CPNI safeguards:

Sec. 64.2009 Safeguards required for use of CPNI.

(a) Telecommunications carriers must implement a system by which the status of a customer's CPNI approval can be clearly established prior to the use of CPNI.

Customers who request that RCRTC not use CPNI will have a prominent notation on their customer record so that employees can clearly see their CPNI status. An electronic and paper list will also be kept updated.

(b) Telecommunications carriers must train their personnel as to when they are and are not authorized to use CPNI, and carriers must have an express disciplinary process in place.

RCRTC personnel have received an in-depth training on CPNI rules and restrictions. New employees are trained on CPNI as part of their orientation. Disciplinary processes for employees not following CPNI rules follow RCRTC's established disciplinary procedures.

(c) All carriers shall maintain a record, electronically or in some other manner, of their own and their affiliates' sales and marketing campaigns that use their customers' CPNI. All carriers shall maintain a record of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. The record must include a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as a part of the campaign. Carriers shall retain the record for a minimum of one year.

To date, RCRTC has not used CPNI. If and when RCRTC uses CPNI for marketing purposes, this safeguard will be followed. RCRTC does not disclose CPNI information to third parties.

(d) Telecommunications carriers must establish a supervisory review process regarding carrier compliance with the rules in this subpart for outbound marketing situations and maintain records of carrier compliance for a minimum period of one year. Specifically, sales personnel must obtain supervisory approval of any proposed outbound marketing request for customer approval.

To date, RCRTC has not used CPNI for outbound marketing programs or campaigns. If and when RCRTC uses CPNI for marketing purposes, this safeguard will be followed. An RCRTC supervisor has been identified for this responsibility and RCRTC sales personnel are trained to follow this supervisory approval process prior to use of CPNI.

(e) A telecommunications carrier must have an officer, as an agent of the carrier, sign a compliance certificate on an annual basis stating that the officer has personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the rules in this subpart. The carrier must provide a statement accompanying the certificate explaining how its operating procedures ensure that it is or is not in compliance with the rules in this subpart.

This safeguard has been met and RCRTC's compliance certificate and this statement of compliance procedures are on file in our office per the CPNI rules.